

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION**

**EQUAL EMPLOYMENT OPPORTUNITY
COMMISSION,**

Plaintiff,

Civil Action No.
2:14-cv-14-13710
Hon. SEAN F. COX

v.

**R.G. & G.R. HARRIS FUNERAL
HOMES, INC.,**

Defendant.

**DEFENDANT R.G. & G.R. HARRIS FUNERAL
HOMES, INC'S., PRELIMINARY LAY
WITNESS LIST**

NOW COMES the Defendant, R.G. & G.R. HARRIS FUNERAL HOMES, INC, by and through its attorney, KIRKPATRICK LAW OFFICES, P.C., and for its Preliminary Lay Witness List state as follows:

1. Thomas F. Rost
2. Ms. Dolores Nemeth
3. Ryan Kish
4. Shannon Kish
5. Troy Shaffer
6. Cody Higley
7. Tia Macklin
8. Individual known to Defendant as Anthony Stephens
9. Steven Rost

10. Donna Stephens
11. George Crawford
12. Any medical personnel that treated Stephens, including but not limited to any doctor, psychologist, psychiatrist, health care professional, and any person who have evaluated, assessed or treated Stephens
13. Cecelia M. Hanchon, LMSW
14. REPRESENTATIVES, AGENTS, EMPLOYEES, AND/OR RECORDS CUSTODIANS OF R.G. & G.R. HARRIS FUNERAL HOMES, INC.
15. Jason Wright
16. Shajini Khan
17. Family members of Stephens
18. Any witnesses identified by Plaintiff in response to any outstanding or future discovery requests
19. All witnesses listed on Plaintiff's Witness List.
20. All persons identified by the parties in their deposition transcripts and answers to interrogatories.
21. Any necessary rebuttal witnesses.
22. Plaintiff reserves the right to list any additional witnesses as may become known through future discovery.

Respectfully submitted,

JOEL J. KIRKPATRICK, P.C.

/s/ Joel J. Kirkpatrick
Joel J. Kirkpatrick
Attorney for Appellant

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Dated: September 1, 2015

CERTIFICATE OF SERVICE

I certify that on September 1, 2015, a copy of the above *filing* was filed electronically via the ECF filing system. Notice of this filing will be sent to all parties by operation of the Court's electronic filing system. Parties may access this filing through the Court's system.

/s/ Joel J. Kirkpatrick

JOEL J. KIRKPATRICK